

**FDD-PST**

---

**From:** vhart@colquitt.k12.ga.us  
**Sent:** Friday, April 28, 2000 5:05 PM  
**To:** fdd-pst@fns.usda.gov  
**Cc:** gdrawdy@colquitt.k12.ga.us  
**Subject:** Comments USDA BPR

It is my hope that these comments will be given consideration and that this process will not be one that we as food service professionals are committed to in haste and suffer from over the long term.

I am school nutrition director for thirteen schools in rural South Georgia. The commodity foods program is very important to the financial well being of our school nutrition program and to the agricultural community we serve.

My two greatest concerns are use of commercial labels for commodity foods and full substitutability of commodity product.

The use of commercial will make the separate inventory and crediting of purchased and commodity foods difficult at best and impossible at worst. Products would have to be labeled on sight which creates additional work for already strained personnel. This also places a great deal of responsibility on vendors to identify products that have an identical appearance. If USDA labels seen only by the staff are seen as inferior we need to educate the public and our own staff. My major concern with full substitutability is the increased opportunity for processors to use lower cost non- domestic products. Full substitution also leaves a much larger supply of schools' food subject to the recalls, alerts, and holds that are becoming almost common in the commercial sector.

I applaud your efforts to process commodities with limited demand in their current form. I would also welcome written hold and recall procedures and a general streamlining of this procedure when it is necessary. I hope that you will encourage cooperation between districts and that truckload requirements will be relaxed. I believe all of these changes could easily be done within the existing program.

I realize I have made no reference to certain suggestions. This is because I believe the current proposals have not been given sufficient thought and that the proposals are not clear.

At the end of this comment period I urge you to tabulate comments categorized by the sixteen improvement items and publish them for nationwide access.

Before making drastic changes in a program that supports an already beleaguered agricultural economy and provides nutritious food for our children a nationwide study should be conducted and pilots established in several states representing various parts of the country.

Thank you for the opportunity to express my opinions and concerns.

Virginia T. Hart

School Nutrition Director

Colquitt County, Georgia